

# EXHIBIT A

Eric A. Liepins  
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PROPOSED ATTORNEY FOR DEBTOR

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION

IN RE	§	
	§	
BACKYARD WORKROOM, LLC	§	Case No. 22-41366
	§	
DEBTOR	§	

MOTION TO SELL PROPERTY OF THE ESTATE

**NO HEARING WILL BE CONDUCTED ON THIS MOTION UNLESS A WRITTEN OBJECTION OR REQUEST FOR HEARING IS FILED WITH THE UNITED STATES BANKRUPTCY CLERK, 660 N. CENTRAL EXPRESSWAY, 3<sup>RD</sup> FLOOR, PLANO, TEXAS 75074, WITHIN TWENTY-ONE (21) DAYS FROM THE DATE OF THE FILING OF THIS MOTION, UNLESS THE COURT, SUA SPONTE, OR UPON TIMELY APPLICATION OF A PARTY IN INTEREST, SHORTENS OR EXTENDS THE TIME FOR FILING SUCH OBJECTION OR REQUEST FOR HEARING.**

**IF NO OBJECTION OR REQUEST FOR HEARING IS TIMELY FILED, THE MOTION SHALL BE DEEMED TO BE UNOPPOSED AND THE COURT MAY ENTER AN ORDER GRANTING THE RELIEF SOUGHT. THE COURT RESERVES THE RIGHT TO SET ANY MATTER FOR HEARING.**

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Backyard Workroom, LLC, Debtor in the above styled and numbered cause and files this its Motion to Sell Property of the Estate ("Motion") and would respectfully show unto the Court as follows:

1. This Court has jurisdiction over this proceeding and the parties and property affected hereby pursuant to 28 U.S.C. §§1334 and 157. Consideration of the Motion constitutes a core proceeding as defined in 28 U.S.C. §157(b)(2)(A), (K), (M) and (O).
2. The Debtor commenced this proceeding on October 14, 2022 by filing a voluntary petition under Chapter 11 of the United States Bankruptcy Code. Since the filing of the petition, the Debtor has remained in possession of its assets and continued in operation of its business as a debtor-in-possession pursuant to 11 U.S.C. §1184.
- 3 The Debtor's business consists of the design, manufacturing and installation of outdoor structure , commonly referred to as "tiny houses".
4. In order for the Debtor to maintain operations the Debtor is in need to capital infusions which the Debtor has not been able to obtain.
5. As a result of a determination that the panels used by the Debtor in its current operations are not sufficient to meet the requirements of many zoning agencies, the Debtor has determined the best alternative is to sell the company for an amount sufficient to replay the creditors.
6. The Debtor has received an offer to purchase the debtor's trade name, website, trademarks, tools, furniture fixtures, inventory and goodwill for the price of \$500,000.<sup>1</sup> ("Assets").
7. The purchaser is Sustainable Development Group, LLC ("Sustainable").
8. Sustainable is a third party not affiliated with the Debtor or any of its principals.
9. The terms of the sale are cash payment upon approval of the Bankruptcy Court.

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<sup>1</sup>For avoidance of doubt the sale does not include any patents or application for patents.

10. The Debtor seeks an Order approving the Sale with the net proceeds and be held pending further Order of this Court.

WHEREFORE, PREMISES CONSIDERED, the Debtor would request this matter be set down for an Hearing and that upon hearing, this Court enter an Order authorizing the Debtor's sale of the Assets described in this Motion, and for such other and further relief as the Debtor may show itself justly entitled.

Respectfully submitted,

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By: /s/ Eric Liepins  
Eric A. Liepins, SBN 12338110  
PROPOSED ATTORNEY FOR DEBTOR

Certificate of Service

I hereby certify that a true and correct copy of the foregoing Motion was sent to all creditors via mail on this the 8th day of December 2022.

/s/ Eric Liepins  
Eric A. Liepins

Label Matrix for local noticing  
0540-4  
Case 22-41366  
Eastern District of Texas  
Sherman  
Fri Oct 14 16:32:23 CDT 2022

Backyard Workroom, LLC  
2901 Technology Drive  
Suite 199  
Plano, TX 75074-7457

Betsy Beard  
905 Timberline Ct.  
Fort Worth, TX 76126-3850

Blue Cross Blue Shield of Texas  
PO Box 650615  
Dallas, TX 75265-0615

Bonton Farms  
6911 Bexar Street  
Dallas, TX 75215-5410

Built Designs, LLC  
1706 Juanita Drive  
Arlington, TX 76013-3540

Carlos & Maranda Chambers  
513 Firethorn Court  
Burleson, TX 76028-1386

Champion Janitorial  
664 N Glenville Dr  
Richardson, TX 75081-2832

Chris & Veronica Canterbury  
8991 Opal Canyon Court  
Sacramento, CA 95829-9290

Comptroller  
117 E. 17th Street  
Austin, TX 78701

Conley Rose Intellectual Property Law  
777 N Eldridge Pkwy Ste 600  
Houston, TX 77079-4524

Crystal Ellison  
2207 Cales Dr.  
Arlington, TX 76013-1411

Daniel C. Smith P.E Consulting Engineers  
9650 Strickland Rd Ste 103185  
Raleigh, NC 27615-1902

Dawson Logistics Assets LLC  
575 Maryville Centre Dr, Ste 500  
Saint Louis, MO 63141-5867

Elite Energy Inspections  
4400 Cotton Belt Pkwy  
Mc Gregor, TX 76657-3495

Frontier Communications  
PO Box 740407  
Cincinnati, OH 45274-0407

Horton World Solutions, LLC  
2106 E State Highway 114 Suite 301  
Southlake, TX 76092-6598

(p)INTERNAL REVENUE SERVICE  
CENTRALIZED INSOLVENCY OPERATIONS  
PO BOX 7346  
PHILADELPHIA PA 19101-7346

Eric A Liepins  
Eric A. Liepins, P.C.  
12770 Coit Road  
Suite 850  
Dallas, TX 75251-1364

Marcelo Migoni  
3516 Northhaven Rd.  
Dallas, TX 75229-2646

Metal Supermarkets, Inc.  
1401 Summit Ave, Unit 7  
Plano, TX 75074-8112

Mitchell Welding Supply  
PO Box 692  
Terrell, TX 75160-0013

Muge Darwish  
2813 Nordham Dr  
Austin, TX 78745-4741

Nappco Fastner Company  
7330 N Sam Houston Pkwy W Ste 200  
Houston, TX 77064-3580

Phoenix Funding Group  
2950 W Square Lake Rd Ste 211  
Troy, MI 48098-5725

Pilar Claiborne  
5774 Friar Court  
El Sobrante, CA 94803-3524

RB Shields Me  
910 S Crowley Rd Ste 9428  
Crowley, TX 76036-3686

Reliant Energy  
PO Box 650475  
Dallas, TX 75265-0475

Republic Trash Services  
PO Box 78829  
Phoenix, AZ 85062-8829

Russell Sorrow Sorrow Motion Pictures  
7513 Gairlock Dr  
Fort Worth, TX 76179-4821

Scalepoint  
c/o Joe Reeble  
4717 S. Atlanta  
Tulsa, OK 74105

Sentry Security Solutions LLC  
PO Box 727  
Burleson, TX 76097-0727

Sherwin Williams  
2100 Lakeside Blvd Ste 400  
Richardson, TX 75082-4349

TMC DesignWorks  
15201 S. 4100 Rd  
Claremore, OK 74017-9404

Texas Mutual Insurance  
PO Box 841843  
Dallas, TX 75284-1843

U.S. Attorney General  
Department of Justice  
Main Justice Building  
10th & Constitution Ave., NW  
Washington, DC 20530-0001

US Trustee  
Office of the U.S. Trustee  
110 N. College Ave.  
Suite 300  
Tyler, TX 75702-7231

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified  
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

Internal Revenue Services  
100 Commerce Street  
Mail Code DAL-5027  
Dallas, TX 75242

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)Eric Benavides

End of Label Matrix  
Mailable recipients 36  
Bypassed recipients 1  
Total 37